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VIA ECF

Honorable John G. Koeltl
United State District Court
Southern District of New York
500 Pearl Street, Room 1030
New York, New York 10007

Re: Luis Toro v. Davlins, Inc. - Docket No. 1:22-cv-08321

Dear Judge Koeltl:

We represent Defendant, Davlins, Inc., in the above-captioned matter. We write pursuant to Local Rules 7.1(d) and 5.2(b) and Your Honor's Individual Rule I. E. to respectfully request an extension of time for Defendant to answer or otherwise respond to the Complaint in this matter.

The current deadline to respond to the Complaint is **February 2, 2023**. Defendant requests a brief twelve-day extension to answer or otherwise respond to the Complaint, to **February 14, 2023**. This is Defendant's fourth request for an extension of this deadline. The Court granted Defendant's first, second, and third requests for an extension. The parties continue to engage in discussions regarding the potential resolution of this matter and Defendant makes this fourth request for an extension to give the parties additional time to engage in those discussions. Additionally, Defendant's lead trial counsel is facing a family medical emergency which has impacted trial counsel's ability to meaningfully engage in discussions with counsel for Plaintiff this week. Defendant has conferred with counsel for Plaintiff, Mars Khaimov, and counsel has consented to this request for an extension.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Rachel Mechanic

Rachel Mechanic

APPLICATION GRANTED
SO ORDERED

cc: All Counsel of Record (via ECF)


John G. Koeltl, U.S.D.J.

1/31/23